

III. REMARKS

Claims 1-21 are pending in this application. By this amendment, claims 1, 7, 10 and 16 have been amended. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 16-21 are rejected under 35 U.S.C. §101 as allegedly not being limited to tangible embodiments. Applicants have amended claim 16 to more clearly specify non-signal elements. Claims 1-9 are rejected under 35 U.S.C. §112, first paragraph, as allegedly failing to comply with the written description requirement and the enablement requirement. Applicants have amended independent claims 1 and 7 to include the inadvertently absent word “alternate”. Accordingly, Applicants respectfully request that the Office withdraw the rejections.

Claims 1, 3, 10, 12, 16 and 18 are rejected under 35 U.S.C. §102(c) as allegedly being anticipated by Endo (U.S. Patent Pub. No. 2004/0212841), hereafter “Endo.” Claims 4, 7, 13 and 19 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Olejar *et al.* (U.S. Patent Pub. No. 2003/0037100), hereafter “Olejar.” Claims 2, 11 and 17 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Deng (U.S. Patent No. 6,243,394), hereafter “Deng.” Claims 5, 14 and 20 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo in view of Lakshman *et al.* (U.S. Patent No. 6,078,564), hereafter “Lakshman.” Claims 6, 15 and 21 are rejected under 35 U.S.C. §103(a) as

allegedly being unpatentable over Endo in view of Harris, Jr. *et al* (U.S. Patent No. 6,144,975), hereafter “Harris.” Claim 8 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo and Olejar and further in view of Lakshman. Claim 9 is rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Endo, Olejar and Lakshman and further in view of Harris.

REJECTION OF CLAIMS 1, 3, 10, 12, 16 AND 18 UNDER 35 U.S.C. §102(e)

With regard to the 35 U.S.C. §102(e) rejection over Endo, Applicants assert that Endo does not teach each and every feature of the claimed invention. For example, with respect to independent claims 1, 10 and 16, Applicants respectfully continue to submit that Endo fails to disclose transforming data and alternate data which are received in different formats into two sets of transformed data which are in different formats. In contrast, Endo describes the function of a document transmission controller, which “designates the document input source (the scanner 210 or the HD drive 205) of document data.” Para. 0065, citing FIG. 3. To this extent, Endo teaches that its document data may be from one or two document sources. This passage, however, does not teach multiple sets of document data in different formats, depending of the source. Rather, the document on the HD drive is simply a saved version of the same document in the same format that would be yielded by the scanner.

The Office further attempts to show multiple input formats with a passage in Endo that recites “...the document transmission controller 302 provides a data transmission format to the format converter 308 in accordance with the classified destination list.” Para. 0065, citing FIG. 3. To this extent, the format that is provided to the format converter is provided based on the

destination, i.e., in accordance with the destination list. As such, the format that the document transmission controller of Endo provides is not the format for the source but rather the format for the destination. A format converter of Endo then converts the input document data to data in the designated data transmission format. Para. 0065, citing FIG. 3. To this extent, Endo, while having a mechanism to deal with multiple destination formats discloses no such mechanism to deal with multiple source formats.

The Office, although failing to specifically address the subject of multiple source formats in the Response to Arguments section of its most recent Office Action, has previously stated that “since different scanner or similar device may scan and save the data in various format, the input document need not necessary be of the same format.” Final Office Action, page 12. However, nowhere does Endo explicitly disclose that this is the case for its format converter. To this extent, Endo fails to disclose receiving and converting multiple data sets in different input formats or any mechanism for dealing with a plurality of input formats. Accordingly, in the case that this argument continues to reflect the Office’s thinking, Applicants submit that the Office’s prior factual statement is unsubstantiated and amounts to Official Notice and request that the Office specify its rationale for the rejection, withdraw the rejection or provide references that teach this feature.

To this extent, the conversion of Endo that is from a single format (i.e., that of a scanned document retrieved directly from the scanner or from a saved scan) to a number of formats does not accomplish the many to many conversion of the claimed invention. This is because Endo does not teach multiple sets of input document data having different formats. Instead, the input

document data of Endo is always in the same format, i.e. inputted from a scanner or the like.

Abstract. Accordingly, Applicants request that the rejection be withdrawn.

With further respect to independent claims 1, 10 and 16, Applicants submit that Endo also fails to teach receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a logical purpose for which the data included therein is used. The Office equates the transaction type of the claimed invention with the transmission methods such as email, ftp, fax of Endo. Office Action, page 4, citing Endo, FIGS. 4-8; pp. 0055-0056, 0060-0065. To this extent, the transmission methods of Endo indicate the manner in which the document data is to be transmitted and do not define purported use of the data itself, e.g., an order or an invoice. This distinction is further borne out in the language of the claims in which the *format* of the data is claimed separately from the transaction type that defines the *logical purpose* of the data. To this extent, Endo teaches no identification of the logical purpose of the data that is separate from its format.

In contrast, the claimed invention includes "...receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a logical purpose for which the data included therein is used." Claim 1. As such, unlike the transmission methods of Endo, which indicate the manner in which the document data is to be transmitted, the transaction type that is included in the data of the claimed invention defines the logical purpose of the data. This transaction type is distinct from the format of the transaction as evidenced by the claiming of each as a distinct feature. For example, referring to Fig. 3 of the specification the transaction type may distinguish between invoices and orders while the format distinguishes between formats X, Y and Z. Thus, the transaction type as included in the claimed

invention is not taught by the transmission methods of Endo, which are merely formats.

Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With respect to dependent claims, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicants submit that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicants respectfully request withdrawal of this rejection.

B. REJECTION OF CLAIMS 2, 4-9, 11, 13-15, 17 and 19-21 UNDER 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejections, Applicants submit that the combined features of the cited art fail to teach each and every feature of the claimed invention. For example, with respect to independent claim 7, as argued above with respect to independent claims 1, 10 and 16, Endo fails to teach or suggest receiving, on the server, data to be routed from a source to a destination, the data having the destination and a transaction type that defines a logical purpose of the data included therein. Furthermore, with respect to independent claim 7, as argued above with respect to independent claims 1, 10, and 16, Endo fails to teach or suggest that the application is adapted to transform the data which is received in one of a plurality of formats into the transformed data which is in one of a plurality of formats. The other cited references do not cure this deficiency. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

With regard to the Office's arguments regarding dependent claims, Applicants herein incorporate the arguments presented above with respect to independent claims listed above. In

addition, Applicants submit that all dependant claims are allowable based on their own distinct features. However, for brevity, Applicants will forego addressing each of these rejections individually, but reserve the right to do so should it become necessary. Accordingly, Applicants respectfully request that the Office withdraw its rejection.

IV. CONCLUSION

In addition to the above arguments, Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/Hunter E. Webb/

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Hunter E. Webb
Reg. No.: 54,593

Hoffman Warnick LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)